

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of)
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Numbering Resource Optimization)
)

CC Docket No. 99-2007

To: The Commission

MOTION FOR EXTENSION OF TIME

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Association for Local Telecommunications Services ("ALTS"),¹ Competitive Telecommunications Association ("CompTel"),² Personal Communications Industry Association ("PCIA"),³ Voicestream Wireless Corporation ("VoiceStream")⁴ and Winstar Communications, Inc. ("Winstar")⁵ (collectively the "Joint Movants"), through the undersigned and pursuant to

¹ ALTS is the leading national industry association whose mission is to promote facilities-based local telecommunications competition. Created in 1987, ALTS has offices in Washington, D.C. and Irvine, California and now represents more than 200 companies that build, own, and operate competitive local networks.

² Founded in 1981, CompTel is the leading national association representing U.S. and international competitive communications firms and their suppliers, who offer a variety of local, long distance, international, Internet and wireless services.

³ PCIA is an international trade association established to represent the interests of the commercial and private mobile radio service communications industries and the fixed broadband wireless industry. PCIA's Federation of Councils includes: the Paging and Messaging Alliance, the PCS Alliance, the Site Owners and Managers Association, the Private Systems Users Alliance, the Mobile Wireless Communications Alliance, and the Wireless Broadband Alliance.

⁴ Based in Bellevue, WA, VoiceStream is a leading, national provider of wireless communications services in the country. VoiceStream is the largest provider of personal communications service using the globally dominant GSM technology in the United States. VoiceStream is a member of the North American GSM Alliance LLC, a group of U.S. and Canadian digital wireless PCS carriers. The GSM Alliance helps provide GSM wireless communications for their customers in more than 3,500 U.S. and Canadian cities and towns as well as international service.

⁵ Winstar is a wireline competitive local exchange carrier ("CLEC"), using fixed wireless technology, with operations throughout the top 50 Market Service Areas ("MSAs") in the United States.

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Section 1.46 of the Commission's rules,⁶ hereby request that the Federal Communications Commission ("FCC") extend the time for filing comments and reply comments in response to the *Further Notice of Proposed Rulemaking* ("FNPRM") in the above-captioned proceeding.⁷ Specifically, the Joint Movants request that the FCC extend the date for comments from May 1, 2000 to May 19, 2000, and the date for reply comments from May 16, 2000 to June 9, 2000. The Joint Movants believe that a modest extension of the comment and reply comment deadlines would enable interested parties to provide more substantive and complete comments on the complex issues raised in the *FNPRM*. Therefore, granting an extension of the comment and reply comment deadlines would enhance the overall quality of the comments and reply comments, and would provide a more complete record for consideration.

In the *Report and Order*, the FCC adopted new policies that will significantly change the way that carriers request and receive numbers, and set the stage for the development and implementation of additional numbering resource optimization strategies. The *FNPRM* requests comment on key issues related to these new policies. Although some of these issues have been discussed generally during this proceeding, none of the issues has been addressed in the specific context of the new policies that the FCC adopted in the *Report and Order*. For example, many parties addressed utilization thresholds during the last comment cycle, but the utilization thresholds that parties suggested most likely were based on a different utilization calculation, as the FCC itself recognizes.⁸ The *FNPRM* also seeks further comment and cost

⁶ 47 C.F.R. §1.46.

⁷ *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 00-104 (rel. March 31, 2000) ("*FNPRM*").

⁸ *Report and Order and FNPRM* at ¶ 115 ("We believe, however, that most of the suggested utilization thresholds included in the numerator were based on additional categories besides *assigned numbers*.").

studies that quantify shared industry and direct carrier-specific costs of thousands-block number pooling, which the FCC will use to establish the contribution level under the new number pooling cost recovery mechanism. Due to the complexity of these and other issues raised in the *FNPRM*, an extension of time is necessary to enhance the overall quality of the comments and reply comments and provide a more complete record for consideration.

CONCLUSION

For the foregoing reasons, the Joint Movants respectfully request the FCC to extend the date for comments from May 1, 2000 to May 19, 2000, and the date for reply comments from May 16, 2000 to June 9, 2000.

Respectfully submitted,

ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES

COMPETITIVE TELECOMMUNICATIONS ASSOCIATION (COMPTEL)

PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION

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April 21, 2000

CERTIFICATE OF SERVICE

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